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RASIER, LLC; and RASIER-CA, LLC  
17

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC.,  
22 PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.  
SHORTNACY IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS  
CASES FOR FAILURE TO COMPLY WITH  
PTO 10**

25 This Document Relates to:

Date: October 3, 2025  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

26 *Jane Doe LS 37 v. Uber Technologies,*  
27 *Inc., et al., No. 3:23-cv-04393-CRB*

1 *E.D. v. Uber Technologies, Inc., et al.*,  
No. 3:23-cv-05307-CRB

2 *Jane Doe LS 244 v. Uber Technologies,*  
3 *Inc., et al.*, No. 3:23-cv-05372-CRB

4 *H.L. v. Uber Technologies, Inc. et al.*,  
No. 3:24-cv-04526-CRB

5 *Jane Roe CL 12 v. Uber Technologies,*  
6 *Inc., et al.*, No. 3:24-cv-04673-CRB

7 *WHB 1293 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-04817-CRB

8 *WHB 1027 v. Uber Technologies, Inc., et*  
9 *al.*, No. 3:24-cv-04820-CRB

10 *WHB 928 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-04825-CRB

11 *WHB 511 v. Uber Technologies, Inc., et*  
12 *al.*, No. 3:24-cv-04842-CRB

13 *WHB 860 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-04845-CRB

14 *WHB 1023 v. Uber Technologies, Inc., et*  
15 *al.*, No. 3:24-cv-04877-CRB

16 *WHB 1002 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-04885-CRB

17 *WHB 1497 v. Uber Technologies, Inc., et*  
18 *al.*, No. 3:24-cv-04891-CRB

19 *WHB 310 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-04903-CRB

20 *WHB 333 v. Uber Technologies, Inc., et*  
21 *al.*, No. 3:24-cv-04905-CRB

22 *WHB 56 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-04908-CRB

23 *WHB 312 v. Uber Technologies, Inc., et*  
24 *al.*, No. 3:24-cv-04928-CRB

25 *WHB 1590 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-04946-CRB

26 *WHB 1667 v. Uber Technologies, Inc., et*  
27 *al.*, No. 3:24-cv-04957-CRB

1 *WHB 1960 v. Uber Technologies, Inc., et*  
2 *al.*, No. 3:24-cv-04960-CRB

3 *WHB 1619 v. Uber Technologies, Inc., et*  
4 *al.*, No. 3:24-cv-04961-CRB

5 *WHB 689 v. Uber Technologies, Inc., et*  
6 *al.*, No. 3:24-cv-04965-CRB

7 *WHB 676 v. Uber Technologies, Inc., et*  
8 *al.*, No. 3:24-cv-05024-CRB

9 *WHB 1837 v. Uber Technologies, Inc., et*  
10 *al.*, No. 3:24-cv-05033-CRB

11 *WHB 1902 v. Uber Technologies, Inc., et*  
12 *al.*, No. 3:24-cv-05040-CRB

13 *WHB 1431 v. Uber Technologies, Inc., et*  
14 *al.*, No. 3:24-cv-05057-CRB

15 *WHB 666 v. Uber Technologies, Inc., et*  
16 *al.*, No. 3:24-cv-05127-CRB

17 *LS 523 v. Uber Technologies, Inc., et al.*,  
18 No. 3:24-cv-05155-CRB

19 *WHB 1394 v. Uber Technologies, Inc., et*  
20 *al.*, No. 3:24-cv-05237-CRB

21 *WHB 466 v. Uber Technologies, Inc., et*  
22 *al.*, No. 3:24-cv-05265-CRB

23 *WHB 1832 v. Uber Technologies, Inc., et*  
24 *al.*, No. 3:24-cv-05305-CRB

25 *WHB 645 v. Uber Technologies, Inc., et*  
26 *al.*, No. 3:24-cv-05356-CRB

27 *WHB 703 v. Uber Technologies, Inc., et*  
28 *al.*, No. 3:24-cv-05361-CRB

*WHB 1272 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-05366-CRB

*LS 529 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05422-CRB

*WHB 994 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-05452-CRB

*WHB 1856 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-05461-CRB

1 *WHB 1021 v. Uber Technologies, Inc., et*  
2 *al.*, No. 3:24-cv-05466-CRB

3 *WHB 1661 v. Uber Technologies, Inc., et*  
4 *al.*, No. 3:24-cv-05468-CRB

5 *WHB 1414 v. Uber Technologies, Inc., et*  
6 *al.*, No. 3:24-cv-05495-CRB

7 *WHB 1468 v. Uber Technologies, Inc., et*  
8 *al.*, No. 3:24-cv-05500-CRB

9 *WHB 1043 v. Uber Technologies, Inc., et*  
10 *al.*, No. 3:24-cv-05501-CRB

11 *CL 21 v. Uber Technologies, Inc., et al.*,  
12 *No.* 3:24-cv-05525-CRB

13 *LS 494 v. Uber Technologies, Inc., et al.*,  
14 *No.* 3:24-cv-05547-CRB

15 *WHB 1840 v. Uber Technologies, Inc., et*  
16 *al.*, No. 3:24-cv-05554-CRB

17 *WHB 1677 v. Uber Technologies, Inc., et*  
18 *al.*, No. 3:24-cv-05556-CRB

19 *WHB 1659 v. Uber Technologies, Inc., et*  
20 *al.*, No. 3:24-cv-05565-CRB

21 *WHB 1618 v. Uber Technologies, Inc., et*  
22 *al.*, No. 3:24-cv-05572-CRB

23 *Jane Roe CL 30 v. Uber Technologies,*  
24 *Inc., et al.*, No. 3:24-cv-05591-CRB

25 *A.T. v. Uber Technologies, Inc., et al.*,  
26 *No.* 3:24-cv-05592-CRB

27 *WHB 1943 v. Uber Technologies, Inc., et*  
28 *al.*, No. 3:24-cv-05598-CRB

*WHB 1552 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-05599-CRB

*WHB 1880 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-05602-CRB

*WHB 1381 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-05603-CRB

*WHB 632 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-05604-CRB

1 *WHB 1260 v. Uber Technologies, Inc., et*  
2 *al., No. 3:24-cv-05613-CRB*

3 *WHB 1544 v. Uber Technologies, Inc., et*  
4 *al., No. 3:24-cv-05622-CRB*

5 *WHB 438 v. Uber Technologies, Inc., et*  
6 *al., No. 3:24-cv-05631-CRB*

7 *LS 248 v. Uber Technologies, Inc., et al.,*  
8 *No. 3:24-cv-05647-CRB*

9 *LS 514 v. Uber Technologies, Inc., et al.,*  
10 *No. 3:24-cv-05658-CRB*

11 *WHB 1611 v. Uber Technologies, Inc., et*  
12 *al., No. 3:24-cv-05665-CRB*

13 *WHB 891 v. Uber Technologies, Inc., et*  
14 *al., No. 3:24-cv-05666-CRB*

15 *WHB 1348 v. Uber Technologies, Inc., et*  
16 *al., No. 3:24-cv-05669-CRB*

17 *WHB 946 v. Uber Technologies, Inc., et*  
18 *al., No. 3:24-cv-05698-CRB*

19 *Jane Roe CL 35 v. Uber Technologies,*  
20 *Inc., et al., No. 3:24-cv-05706-CRB*

21 *WHB 1142 v. Uber Technologies, Inc., et*  
22 *al., No. 3:24-cv-05712-CRB*

23 *WHB 1057 v. Uber Technologies, Inc., et*  
24 *al., No. 3:24-cv-05715-CRB*

25 *WHB 1470 v. Uber Technologies, Inc., et*  
26 *al., No. 3:24-cv-05716-CRB*

27 *Jane Roe CL 44 v. Uber Technologies,*  
28 *Inc., et al., No. 3:24-cv-05744-CRB*

*WHB 494 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05767-CRB*

*WHB 871 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05770-CRB*

*WHB 935 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05776-CRB*

*LS 455 v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-05812-CRB*

1 *CL 55 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05835-CRB

2 *LS 363 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05891-CRB

3  
4 *LS 318 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05932-CRB

5 *WHB 884 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05948-CRB

6  
7 *WHB 991 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05959-CRB

8 *LS 207 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05965-CRB

9  
10 *DMA 1 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05968-CRB

11 *LS 303 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05980-CRB

12  
13 *LS 125 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-05982-CRB

14 *WHB 1556 v. Uber Technologies, Inc., et*  
15 *al.*, No. 3:24-cv-05986-CRB

16 *LS 153 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-06011-CRB

17 *LS 216 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-06029-CRB

18  
19 *LS 233 v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-06030-CRB

20 *Jane Roe CL 73 v. Uber Technologies,*  
21 *Inc., et al.*, No 3:24-cv-7030-CRB

22 *WHB 1999 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-07048-CRB

23 *B.B. v. Uber Technologies, Inc., et al.*,  
24 No. 3:24-cv-07492-CRB

25 *A.A. v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-07549-CRB

26 *E.R. 02 v. Uber Technologies, Inc., et al.*,  
27 No. 3:24-cv-07635-CRB

1 *E.H. v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-08342-CRB

2 *Jane Doe NLG (HK) v. Uber*  
3 *Technologies, Inc., et al.*, No. 3:24-cv-  
08614-CRB

4 *S.G. v. Uber Technologies, Inc., et al.*,  
5 No. 3:24-cv-08675-CRB

6 *Dadej v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-08785-CRB

7 *C.B. v. Uber Technologies, Inc., et al.*,  
8 No. 3:24-cv-09049-CRB

9 *D.J. v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-09050-CRB

10 *E.B. v. Uber Technologies, Inc., et al.*,  
11 No. 3:24-cv-09052-CRB

12 *S.H. v. Uber Technologies, Inc., et al.*,  
No. 3:24-cv-09068-CRB

13 *CL 90 v. Uber Technologies, Inc., et al.*,  
14 No. 3:24-cv-09201-CRB

15 *Jane Doe NLG (R.M.) v. Uber*  
16 *Technologies, Inc., et al.*, No. 3:24-cv-  
09216-CRB

17 *D.C. 2636 v. Uber Technologies, Inc., et*  
*al.*, No. 3:24-cv-09367-CRB

18 *Jane Doe 693827 v. Uber Technologies,*  
19 *Inc., et al.*, No. 3:24-cv-09515-CRB

20 *Jane Doe 691535 v. Uber Technologies,*  
*Inc., et al.*, No. 3:24-cv-09523-CRB

21 *CL 94 v. Uber Technologies, Inc., et al.*,  
22 No. 3:24-cv-09550-CRB

23 *CL 96 v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-00463-CRB

24 *I.A. v. Uber Technologies, Inc., et al.*,  
25 No. 3:25-cv-00822-CRB

26 *CL 99 v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-00855-CRB

1 *L.F. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-01005-CRB

2 *WHB 2060 v. Uber Technologies, Inc., et*  
3 *al.*, No. 3:25-cv-01092-CRB

4 *WHB 2061 v. Uber Technologies, Inc., et*  
5 *al.*, No. 3:25-cv-01095-CRB

6 *WHB 2062 v. Uber Technologies, Inc., et*  
7 *al.*, No. 3:25-cv-01098-CRB

8 *WHB 2063 v. Uber Technologies, Inc., et*  
9 *al.*, No. 3:25-cv-01099-CRB

10 *WHB 2064 v. Uber Technologies, Inc., et*  
11 *al.*, No. 3:25-cv-01101-CRB

12 *WHB 2067 v. Uber Technologies, Inc., et*  
13 *al.*, No. 3:25-cv-01122-CRB

14 *WHB 2070 v. Uber Technologies, Inc., et*  
15 *al.*, No. 3:25-cv-01126-CRB

16 *WHB 2071 v. Uber Technologies, Inc., et*  
17 *al.*, No. 3:25-cv-01130-CRB

18 *WHB 2073 v. Uber Technologies, Inc., et*  
19 *al.*, No. 3:25-cv-01143-CRB

20 *WHB 2075 v. Uber Technologies, Inc., et*  
21 *al.*, No. 3:25-cv-01148-CRB

22 *WHB 2077 v. Uber Technologies, Inc., et*  
23 *al.*, No. 3:25-cv-01150-CRB

24 *WHB 2082 v. Uber Technologies, Inc., et*  
25 *al.*, No. 3:25-cv-01177-CRB

26 *WHB 2084 v. Uber Technologies, Inc., et*  
27 *al.*, No. 3:25-cv-01179-CRB

28 *WHB 2036 v. Uber Technologies, Inc., et*  
*al.*, No. 3:25-cv-01180-CRB

*WHB 2039 v. Uber Technologies, Inc., et*  
*al.*, No. 3:25-cv-01202-CRB

*WHB 2041 v. Uber Technologies, Inc., et*  
*al.*, No. 3:25-cv-01205-CRB

*WHB 2043 v. Uber Technologies, Inc., et*  
*al.*, No. 3:25-cv-01207-CRB



1 *WHB 2044 v. Uber Technologies, Inc., et*  
2 *al.*, No. 3:25-cv-01209-CRB

3 *WHB 2047 v. Uber Technologies, Inc., et*  
4 *al.*, No. 3:25-cv-01215-CRB

5 *WHB 2048 v. Uber Technologies, Inc., et*  
6 *al.*, No. 3:25-cv-01216-CRB

7 *WHB 2049 v. Uber Technologies, Inc., et*  
8 *al.*, No. 3:25-cv-01218-CRB

9 *WHB 2051 v. Uber Technologies, Inc., et*  
10 *al.*, No. 3:25-cv-01226-CRB

11 *WHB 2054 v. Uber Technologies, Inc., et*  
12 *al.*, No. 3:25-cv-01244-CRB

13 *WHB 2057 v. Uber Technologies, Inc., et*  
14 *al.*, No. 3:25-cv-01249-CRB

15 *WHB 2059 v. Uber Technologies, Inc., et*  
16 *al.*, No. 3:25-cv-01255-CRB

17 *S.G. v. Uber Technologies, Inc., et al.*,  
18 No. 3:25-cv-01417-CRB

19 *K.D. v. Uber Technologies, Inc., et al.*,  
20 No. 3:25-cv-01602-CRB

21 *T.K. v. Uber Technologies, Inc., et al.*,  
22 No. 3:25-cv-01651-CRB

23 *S.W. v. Uber Technologies, Inc., et al.*,  
24 No. 3:25-cv-01658-CRB

25 *C.C. v. Uber Technologies, Inc., et al.*,  
26 No. 3:25-cv-01707-CRB

27 *M.S. v. Uber Technologies, Inc., et al.*,  
28 No. 3:25-cv-01863-CRB

*Halligan v. Uber Technologies, Inc., et*  
*al.*, No. 3:25-cv-02104-CRB

*T.C. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02109-CRB

*Jane Doe LS 578 v. Uber Technologies,*  
*Inc., et al.*, No. 3:25-cv-02405-CRB

*CL 129 v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02498-CRB

1 *A.M. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02510-CRB

2 *J.H. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02526-CRB

3  
4 *A.J. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02577-CRB

5 *Jane Doe NLG (KS) v. Uber*  
6 *Technologies, Inc., et al.*, No. 3:25-cv-  
02616-CRB

7 *K.B. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02650-CRB

8  
9 *N.K. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02681-CRB

10 *J.M., v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02689-CRB

11  
12 *T.M. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02704-CRB

13 *S.F. v. Uber Technologies, Inc., et al.,*  
No. 3:25-cv-02708-CRB

14  
15 *CL 132 v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02744-CRB

16 *NLG (IM) v. Uber Technologies, Inc., et*  
17 *al.*, No. 3:25-cv-02771-CRB

18 *M.H. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02859-CRB

19 *K.T. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02880-CRB

20  
21 *T.P. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-03016-CRB

22 *CL 143 v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-03260-CRB

23  
24 *CL 145 v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-03262-CRB

25 *J.P.F. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-03289-CRB

26  
27 *J.M. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-03364-CRB

1 *Batterson, Vanessa v. Uber*  
2 *Technologies, Inc., et al.*, No. 3:25-cv-  
3 03378-CRB

4 *V.M. v. Uber Technologies, Inc., et al.*,  
5 No. 3:25-cv-03591-CRB

6 *CL 153 v. Uber Technologies, Inc., et al.*,  
7 No. 3:25-cv-03818-CRB

8 *Crystal Lugo v. Uber Technologies, Inc.,*  
9 *et al.*, No. 3:25-cv-03969-CRB

10 *Breanna Donaldson v. Uber*  
11 *Technologies, Inc., et al.*, No. 3:25-cv-  
12 03976-CRB

13 *C.E. v. Uber Technologies, Inc., et al.*,  
14 No. 3:25-cv-04100-CRB

15 *S.S. v. Uber Technologies, Inc., et al.*,  
16 No. 3:25-cv-04143-CRB

17 *W.M. v. Uber Technologies, Inc., et al.*,  
18 No. 3:25-cv-04717-CRB

19 *K.N. v. Uber Technologies, Inc., et al.*,  
20 No. 3:25-cv-04719-CRB

21 *R.H. v. Uber Technologies, Inc., et al.*,  
22 No. 3:25-cv-04725-CRB

23 *T.P. v. Uber Technologies, Inc., et al.*,  
24 No. 3:25-cv-04766-CRB

25 *V.R. v. Uber Technologies, Inc., et al.*,  
26 No. 3:25-cv-04767-CRB

27 *S.K. v. Uber Technologies, Inc., et al.*,  
28 No. 3:25-cv-04768-CRB

*L.K. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-04774-CRB

*B.W. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-04796-CRB

*G.G. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-04798-CRB

*D.C. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-04851-CRB

**DECLARATION OF MICHAEL B. SHORTNACY**

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) motion to dismiss the cases of certain Plaintiffs represented by for noncompliance with PTO 5.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the District of Columbia Court of Appeals, and the Bar of the State of New York. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On December 28, 2023, this Court entered Pretrial Order No. 10 (“PTO 10”) in this matter, requiring each Plaintiff to “submit a completed PFS, and executed Authorizations, through MDL Centrality.” *Id.* at 4. PTO 10 required each Plaintiff whose case was a part of the MDL by March 26, 2024 to submit a completed PFS within 60 days of that date—i.e., by May 25, 2024. *Id.* at 5. Each Plaintiff who joined the MDL after March 26, 2024 must submit the completed PFS within 30 days of joining. *Id.* at 6. Each PFS was required to be “substantially complete.” *Id.*

4. Attached to this declaration as **Exhibit A** is a table identifying 179 Plaintiffs who, as of the date of this Declaration, have failed to submit a substantially complete Plaintiff Fact Sheet (“PFS”) by their deadline to do so. The Plaintiffs’ PFS deficiencies, missed deadlines, and Deficiency Notice dates are identified in the table at Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 22, 2025 in Los Angeles, California.

**SHOOK, HARDY & BACON L.L.P.**

/s/ Michael B. Shortnacy

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